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Attorneys for Defendant
GOLDMAN SACHS BANK USA

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

TATYANA ROTKIN,

) Case No. 2:22-cv-01170-MCE-JDP

Plaintiff,

) [Assigned to Hon. Morrison C. England,
) Jr.]

V.

GOLDMAN SACHS BANK USA.

) **STIPULATION AND ORDER FOR
FURTHER EXTENSION OF TIME
FOR DEFENDANT GOLDMAN
SACHS BANK USA TO RESPOND
TO COMPLAINT**

Defendant.

) Action Filed: July 6, 2022

1 Plaintiff Tatyana Rotkin (“Plaintiff”) and defendant Goldman Sachs Bank
2 USA (“GS Bank” and together, with Plaintiff, the “Parties”), by and through their
3 undersigned counsel, hereby stipulate as follows:

4 WHEREAS, on July 6, 2022, Plaintiff filed the Complaint in the United States
5 District Court for the Eastern District of California (Dkt. No. 1);

6 WHEREAS, GS Bank was served with the Complaint on July 12, 2022;

7 WHEREAS, on August 2, 2022, the Parties previously agreed to extend the
8 deadline to respond to the Complaint by twenty-one (21) days, pursuant to L.R.
9 144(a), to and including August 23, 2022 (Dkt. No. 5);

10 WHEREAS, the parties are discussing arbitration and a potential stipulation in
11 an effort to avoid motion practice and also discussing settlement, and therefore the
12 Parties have agreed to extend the date by which GS Bank must answer or otherwise
13 respond;

14 WHEREAS, the Parties, through their respective counsel of record, have
15 agreed to further extend the deadline to respond to the Complaint by seven (7) days,
16 to and including August 30, 2022; and

17 WHEREAS, this stipulation is submitted in good faith and not for purposes of
18 delay.

19 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between
20 Plaintiff and GS Bank, through their respective counsel of record, that GS Bank shall
21 have a further seven (7) day extension of time, to and including August 30, 2022, to
22 file its response to the Complaint.

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1 Dated: August 23, 2022

STROOCK & STROOCK & LAVAN LLP
ARJUN P. RAO
SHERI GUERAMI

4 By: _____ /s/ Sheri Guerami
5 Sheri Guerami

6 Attorneys for Defendant
7 DISCOVER BANK

8 Dated: August 23, 2022

9 PRICE LAW GROUP, APC
10 YOUSSEF H. HAMMOUD

11 By: _____ /s/ Youssef H. Hammoud
12 Youssef H. Hammoud

13 Attorneys for Plaintiff
14 TATYANA ROTKIN

15 IT IS SO ORDERED.

16 Dated: August 25, 2022

17 
18 MORRISON C. ENGLAND, JR.
19 SENIOR UNITED STATES DISTRICT JUDGE